

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LAWRENCE MALLY, On Behalf of Himself  
and All Others Similarly Situated,

Civil Action No. 1:07-CV-7097 (DLC)

Plaintiff,  
-against-

QIAO XING UNIVERSAL TELEPHONE,  
INC., RUI LIN WU, and ALBERT LEUNG,

Defendants.

MILTON PFEIFFER, On Behalf of Himself  
and All Others Similarly Situated,

Civil Action No. 1:07 CV-7252 (DLC)

Plaintiff,  
-against-

QIAO XING UNIVERSAL TELEPHONE,  
INC., RUI LIN WU, and, ALBERT LEUNG,

Defendants.

[Additional Caption on Next Pages]

**NOTICE OF MOTION BY JAMES B. BALABAN FOR  
APPOINTMENT OF LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

Marc I. Gross (MG-8496)  
Jeremy A. Lieberman (JL-1173)  
**POMERANTZ HAUDEK BLOCK  
GROSSMAN & GROSS LLP**  
100 Park Avenue  
New York, New York 10017  
Telephone: (212) 661-1100  
Facsimile: (212) 661-8665

Patrick V. Dahlstrom (PD-5328)  
**POMERANTZ HAUDEK BLOCK  
GROSSMAN & GROSS LLP**  
One North La Salle Street  
Suite 2225  
Chicago, Illinois 60602  
Telephone: (312) 377-1181  
Facsimile: (312) 377-1184

**Attorneys for James B. Balaban**

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ISAAC FISHMAN, Custodian for the IBF Foundation, on Behalf of itself and All Others Similarly Situated,

Plaintiff,

-against-

QIAO XING UNIVERSAL TELEPHONE, INC., WU RUI LIN, WU ZHI-YANG, ALBERT LEUNG, SONNY KWOK WING HUNG, ZE YUN MU, YI HONG ZHANG, and GROBSTEIN HORWATH & CO., LLP

Defendants.

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MICHAEL LOCKE, On Behalf of Himself and All Others Similarly Situated,

Plaintiff,

-against-

QIAO XING UNIVERSAL TELEPHONE, INC., RUI LIN WU, ALBERT LEUNG, ZHI YANG WU, SONNY KWOK WING HUNG, ZE YUN MU, YI HONG ZHANG, and GROBSTEIN, HORWATH & COMPANY LLP,

Defendants.

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Civil Action No. 1:07-CV-7312 (DLC)

Civil Action No. 1:07-CV-7693 (DLC)

REUVEN LAPIN, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

-against-

QIAO XING UNIVERSAL TELEPHONE,  
INC., RUI LIN WU, and ALBERT LEUNG,

Defendants.

Civil Action No. 1:07-CV-7829 (DLC)

**TO: ALL PARTIES AND THEIR COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of James B. Balaban's Motion for Appointment of Lead Plaintiff and Approval of Lead Counsel, filed herewith, proposed Lead Plaintiff James B. Balaban hereby move this Court, the Honorable Denise L. Cote, in the United States District Court, Southern District of New York, Courtroom 11B, 500 Pearl Street, New York, New York, 10007, for an Order:

1. Pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995:
  - (a) appointing James B. Baladan as Lead Plaintiff for the Class of shareholders who purchased or sold call options and purchased or sold put options on the common stock of Qiao Xing Universal Telephone, Inc. during the Class period of June 30, 2004 through July 16, 2007 and who were damaged thereby, and
  - (b) approving Lead Plaintiff's selection of Pomerantz Haudek Block Grossman & Gross LLP as Lead Counsel for the Class.

Dated: October 9, 2007

Respectfully submitted,

**POMERANTZ HAUDEK BLOCK  
GROSSMAN & GROSS LLP**

/s

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